

1 EDMUND G. BROWN, JR., Attorney General
of the State of California
2 GAIL M. HEPPELL
Supervising Deputy Attorney General
3 ISMAEL A. CASTRO, State Bar No. 85452
Deputy Attorney General
4 California Department of Justice
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 323-8203
Facsimile: (916) 324-5567
7

8 Attorneys for Complainant
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10 **BEFORE THE**
PHYSICAL THERAPY BOARD OF CALIFORNIA
11 **DEPARTMENT OF CONSUMER AFFAIRS**
12 **STATE OF CALIFORNIA**
13

14 In the Matter of the Accusation Against:

15 **JENNIFER LYNN RATLIFF, P.T.,**
1271 Rose Avenue
16 Redding, CA 96001

17 **Physical Therapy License**
No. PT 17095,

18 Respondent.
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Case No. 1D 2006 64789

OAH No. 2007080561

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

21 In the interest of a prompt and speedy settlement of this matter, consistent with the
22 public interest and the responsibility of the Physical Therapy Board of California (hereafter
23 “Board”) of the Department of Consumer Affairs, the parties hereby agree to the following
24 Stipulated Settlement and Disciplinary Order which will be submitted to the Board for approval
25 and adoption as the final disposition of the Accusation.

26 **PARTIES**

27 1. Steven K. Hartzell (Complainant) is the Executive Officer of the Physical
28 Therapy Board of California. He brought this action solely in his official capacity and is

represented in this matter by Edmund G. Brown, Jr., Attorney General of the State of California,
by Ismael A. Castro, Deputy Attorney General.

2. Respondent Jennifer Lynn Ratliff (hereafter “respondent”) is represented in this proceeding by attorney Richard Farrell, whose address is 1700 Placer Street, Redding, California 96001.

3. On January 14, 1991, Physical Therapy License number 17095 was issued by the Board to respondent. At all times relevant to this proceeding said license has been in full force and effect and will expire unless renewed on October 31, 2008.

JURISDICTION

4. Accusation No. 1D 2006 64789 was filed before the Physical Therapy Board of California, Department of Consumer Affairs, and is currently pending against Respondent. A copy of Accusation is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 1D 2006 64789. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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1 **CULPABILITY**

2 8. Respondent admits the truth of each and every charge and allegation in
3 Accusation No. 1D 2006 64789.

4 9. Respondent agrees that her Physical Therapist License is subject to
5 discipline and she agrees to be bound by the Physical Therapy Board's imposition of discipline as
6 set forth in the Disciplinary Order below.

7 **CONTINGENCY**

8 10. This stipulation shall be subject to approval by the Physical Therapy
9 Board. Respondent understands and agrees that counsel for Complainant and the staff of the
10 Physical Therapy Board may communicate directly with the Board regarding this stipulation and
11 settlement, without notice to or participation by Respondent or her counsel. By signing the
12 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek
13 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
14 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
15 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
16 action between the parties, and the Board shall not be disqualified from further action by having
17 considered this matter.

18 11. The parties understand and agree that facsimile copies of this Stipulated
19 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same
20 force and effect as the originals.

21 12. In consideration of the foregoing admissions and stipulations, the parties
22 agree that the Board may, without further notice or formal proceeding, issue and enter the
23 following Disciplinary Order:

24 **DISCIPLINARY ORDER**

25 **IT IS HEREBY ORDERED** that Jennifer Lynn Ratliff, holder of Physical
26 Therapist License No. PT 17095, shall be publicly reprovved by the Physical Therapy Board of

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1 California for violating Business and Professions Code section 2660, subdivision (d) as set forth
2 in Accusation No. 1D 2006 64789 (a copy of which is attached hereto as Exhibit B and hereby
3 incorporated by reference as if fully set forth).

4 **ACCEPTANCE**

5 I have carefully read the above Stipulated Settlement and Disciplinary Order and
6 have fully discussed it with my attorney, Frank Farrell. I understand the stipulation and the effect
7 it will have on my license. I enter into this Stipulated Settlement and Disciplinary Order
8 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
9 Physical Therapy Board of California.

10 DATED: November 2, 2007.

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12 Original Signed By:
13 JENNIFER LYNN RATLIFF
Respondent

14 I have read and fully discussed with Respondent Jennifer Lynn Ratliff the terms
15 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
16 Order. I approve its form and content.

17 DATED: November 2, 2007.

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19 Original Signed By:
20 RICHARD FARRELL
Attorney for Respondent

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Physical Therapy Board of California of the Department of Consumer Affairs.

DATED: October 23, 2008.

EDMUND G. BROWN, JR., Attorney General
of the State of California

Original Signed By: _____
ISMAEL A. CASTRO
Deputy Attorney General
Attorneys for Complainant